

Fall 1999 -- Proposed OSHA Rule on Safety and Health Programs Expected

The Occupational Safety and Health Administration (OSHA) has concluded that effective management of safety and health protection is a crucial factor in reducing the extent and the severity of job-related accidents, injuries, and illnesses. Under OSHA's Voluntary Protection Programs (VPP), for example, employers that have set up comprehensive safety and health programs have achieved injury and illness rates as much as 60 percent below those of other firms in their industry. At these worksites, worker safety and health, instead of being relegated to the sidelines or delegated to a single individual, is a fundamental part of the company's business, a value as central to success as producing goods and services or making a fair profit. Thus, the protection of the safety and health of the workforce at such sites has become a self-sustaining system that is fully integrated into the day-to-day operations of the facility. OSHA's experience in the VPP has also indicated that effective safety and health management also improves employee productivity and morale.

OSHA has recently drafted a proposed rule on safety and health programs. Working extensively with stakeholders from the industry, labor, safety and health organizations, state governments, trade associations, insurance companies and small businesses in developing this draft proposal, OSHA is proposing a requirement for employers to develop basic safety and health programs to improve worker protection.

At its heart, a safety and health program promotes the exercise of reasonable diligence in the workplace in order to protect workers. Safety and health programs are systematic, simple approaches to managing workplace safety and health. As a result of many years of experience, OSHA has identified core elements that have proven necessary to implement an effective safety and health program. The draft proposed rule would require that safety and health programs include five major elements: management leadership and employee participation; hazard identification and assessment; hazard prevention and control; training; and evaluation of the program's effectiveness. The elements are simple and straightforward. Reduced to their basic level, these elements require an employer to work credibly with its employees to find workplace hazards and fix them, and to ensure that workers, supervisors and managers can recognize a hazard when they see it.

Program Elements:

- **Management Leadership and Employee Involvement.** Management commitment and employee involvement are complimentary. A safety and health program will only work if management is fully committed and communicates that commitment to the entire organization. Management commitment provides the motivational force and the resources for planning and controlling activities within the organization. In an effective program, management regards worker safety and health as a fundamental value of the organization and applies its commitment to safety and health protection with as much vigor as it uses for other organizational purposes. Employee involvement means actually engaging front-line employees who are closest to workplace operations and have the highest stake in preventing job-related accidents in developing, implementing and evaluating the safety and health program. Employee involvement provides the vehicle through which workers develop and/or express their own commitment to safety and health protection for themselves and their fellow workers. Employee involvement spreads the responsibility for safety and health and

ensures that more eyes seek and identify problems and more perspectives are used to develop solutions.

- **Hazard Identification and Assessment.** The identification of both recognized and potential safety and health hazards at a worksite is a critical foundation for safety and health protection. In simple terms, hazard identification and assessment requires employers to look for hazards, decide how serious they are and prioritize their control or elimination. Hazard identification and assessment requires an active, ongoing examination and analysis of current work processes and conditions as well as those which could result from changes in work practices. Front-line employees are enabled to avert injuries and accidents by identifying and bringing hazards to the attention of their supervisors.
- **Hazard Prevention and Control.** Once hazards are identified and assessed, they must be promptly prevented or controlled. Hazard prevention and control provide the solutions to the safety and health problems discovered by the program's hazard identification and assessment activities. Unless hazards are prevented, controlled or eliminated, workers who are exposed to them will continue to be killed, hurt or made ill. Management action in this respect determines the credibility of its safety and health management policy and the usefulness of its entire program.
- **Information and Training.** Information and training are essential means for communicating practical understanding of the requirements of effective safety and health protection to all personnel. Information and training ensure that both workers and management have the information, knowledge and skills to recognize identified hazards; know what controls are in place to prevent exposure; and understand their roles in preventing or minimizing exposures. Without such understanding, managers, supervisors, and other employees will not perform their responsibilities for safety and health protection effectively.
- **Program Evaluation.** Program evaluation simply tells an employer to assess the effectiveness of its safety and health program, to ensure that it protects workers. Where deficiencies have been identified, they should be corrected.

The extent to which the program is described in writing is less important than how effective the program is in practice. OSHA recognizes that simple, unwritten policies, practices, and procedures are adequate to address the hazards in many smaller or less hazardous establishments. However, as the size of the worksite and complexity of a hazardous operation increases, the need for written guidance increases to ensure clear communication of policies and priorities and consistent and fair application of rules. The more complex and hazardous an operation is, the more formal (written) and complex the program will probably need to be. A written program which is revised regularly can clarify policy, create consistency and continuity in its interpretation, serve as a checkpoint whenever there is a question of priority between safety and production, and support fair and equitable enforcement of safe work rules and practices.

Despite the progress that has been made since OSHA's inception in 1970, thousands of workers die each year in accidents or from occupational diseases while working. Many options exist for protecting workers from life-threatening or workplace hazards, but OSHA cannot do the job alone. To fill this gap, OSHA has developed a draft proposed rule that provides a general framework for employers to follow but leaves each individual employer free to add workplace-specific procedures and to adopt management practices that suit the needs of their particular workplace.

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